

New Jersey Office
576 Main Street, Suite C
Chatham, New Jersey 07928JOHN ELEFTERAKIS*
NICHOLAS ELEFTERAKIS
RAYMOND PANEKOLIVER R. TOBIAS
JEFFREY B. BROMFELD
FAIZAN GHAZNAVI
GABRIEL P. HARVIS
BAREE N. FETT
STEPHEN KAHN
EVAN M. LA PENNAKRISTEN PERRY – CONIGLIARO
AIKA DANAYEVA
ARIANA ELEFTERAKIS
MICHAEL INDELICATO
MICHAEL MARRON
DOMINICK MINGIONE
MARK NEWMAN
AGGELIKI E. NIKOLAIDIS
JOSEPH PERRY
MARIE LOUISE PRIOLO *
KEYONTE SUTHERLAND
WAYNE WATTLEY

*Also Admitted In New Jersey

July 28, 2020

BY ECFHonorable Katharine H. Parker
United States Magistrate Judge
Southern District of New York
500 Pearl Street
New York, New York 10007Re: *Bah v. City of New York, et al.*, 20 CV 263 (AT) (KHP)

Your Honor:

I represent plaintiff in the above-referenced matter. I write on behalf of the parties to respectfully provide the Court with a status report and to request an extension of the existing schedule, including plaintiff's amendment deadline, which expires today. Plaintiff apologizes for the untimeliness of this submission.¹

If it should please the Court, the parties are working cooperatively to identify the individual defendants so that the complaint may be amended and they may be joined in the action. To that end, defendants have propounded and plaintiff has answered identification interrogatories. Defendants are working to identify the individuals and expect that process to conclude in approximately thirty days. Once the identities are provided, plaintiff will be in a position to promptly amend the complaint. Accordingly, the parties respectfully propose the following amended schedule:

Defendants to identify officers by:	August 31, 2020
Plaintiff to amend complaint by:	September 4, 2020
Defendants to file motion by:	October 5, 2020
Plaintiff to oppose by:	November 5, 2020

¹ By order dated May 23, 2020, the parties were required to file a status report by July 31, 2020. The parties respectfully submit the instant letter in satisfaction of that order.

Hon. Katharine H. Parker


July 28, 2020

Defendants' reply, if any, due by: November 19, 2020

In light of the foregoing, the parties respectfully request that the Court review and endorse the revised proposed schedule.

Thank you for your consideration of this request.

Respectfully submitted,



Gabriel P. Harvis

cc: Defense Counsel